

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DWAIN EDWARD THOMAS,

Plaintiff,

v.

KEVIN STITT, *et al*,

Defendants.

**Case No.: 20-cv-944-D**

**DEFENDANTS' FINAL WITNESS AND EXHIBIT LISTS**

Defendants, Tom Bates, Steven Harpe, and Hastings Siegfried, by and through counsel of record Assistant Attorneys General Alejandra Brigida and Lauren Ray, and pursuant to the Court's Scheduling Order [Docs. 70, 79], provide their Final Witness and Exhibit Lists<sup>1</sup>:

<b>NO.</b>	<b>WITNESS</b>	<b>PROPOSED TESTIMONY</b>
	<b>WITNESSES EXPECTED TO BE CALLED:</b>	
1.	Tom Bates Executive Director, Oklahoma Pardon and Parole Board c/o Undersigned Counsel	Deposed.
2.	Carl Leroy Long Jr. Field Director, Oklahoma Pardon and Parole Board c/o Undersigned Counsel	Mr. Long is expected to testify as to the procedures and processes by which parole investigators conduct investigations and draft investigative reports.

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<sup>1</sup> Defendants reserve the right to supplement or amend Witness and Exhibit Lists as discovery is ongoing. The discovery cutoff in this case is August 19, 2024. *See* June 28, 2024 Order (Dkt. 96).

3.	Clint Castleberry Chief Administrator of Classification and Programs, Oklahoma Department of Corrections c/o Undersigned Counsel	Deposed.
4.	Deborah Romine Parole Process Coordinator, Oklahoma Department of Corrections (ODOC) c/o Undersigned Counsel	Deposed.
5.	Mark Knutson Manager of the Administrative Review Authority, Oklahoma Department of Corrections (ODOC) c/o Undersigned Counsel	Testify as to the ODOC grievance process.
6.	T. Hastings Siegfried Chairman, Oklahoma Board of Corrections c/o Undersigned Counsel	Deposed.
7.	Kelly Doyle Former Member of the Oklahoma Pardon and Parole Board c/o Kevin Doyle Pray Walker 21 North Greenwood Avenue, Suite 400 Tulsa, OK 74120 918-581-5516	Deposed.
	<b>WITNESSES WHICH MAY BE CALLED:</b>	
8.	Dwain Edward Thomas Plaintiff c/o Emily Long 1301 Pennsylvania Ave, NW Washington, DC 20004 202-389-3065	Facts and circumstances regarding the claims and allegations of this matter.
	Any and all witnesses listed by a party and not objected to by Defendants.”	

	Any witness listed by a party and not objected to by Defendants.	
	Any and all witnesses needed to identify or authenticate any exhibits	
	Defendants reserve the right to list additional witnesses given ongoing discovery in this matter	

### EXHIBIT LIST

NO.	EXHIBIT DESCRIPTION
	<b>EXHIBITS EXPECTED TO USE:</b>
1.	Plaintiff Parole Docket Ballot – October 2022 [BS DEF PPB 00020]
2.	Plaintiff Investigative Report – 09/01/2022 [BS DEF PPB 00021-00023]
3.	Plaintiff Request to Parole Investigator – 08/25/2020 [BS DEF PPB 00024]
4.	Plaintiff Request to Parole Investigator – 3/4/2020 [BS DEF PPB 00025]
5.	Plaintiff Request to Parole Investigator – 10/10/2019 [BS DEF PPB 00026]
6.	Plaintiff Request to Parole Investigator – 09/08/2019 [BS DEF PPB 00027-00029]
7.	Plaintiff Parole Docket Ballot – October 2019 [BS DEF PPB 00030]
8.	Plaintiff Parole Docket Ballot – October 2016 [BS DEF PPB 00032]
9.	Plaintiff Investigative Report – 9/6/2016 [BS DEF PPB 00033-00035]
10.	Plaintiff Investigative Report – 9/5/2013 [BS DEF PPB 00036-00038]
11.	Plaintiff Parole Docket Ballot – October 2013 [BS DEF PPB 00039]
12.	Plaintiff Investigative Report – 10/22/2010 [BS DEF PPB 00040-00042]
13.	Plaintiff Parole Docket Ballot – October 2010 [BS DEF PPB 00043]
14.	Plaintiff Notification of Parole Consideration Date [BS DEF PPB 00044]

15	Plaintiff Pardon and Parole Board Docketing Worksheet [BS PPB 00045]
16	Pardon and Parole Board Investigator Handbook – 2023 [BS DEF PPB 00138-188]
17	Victims Protest Letters Re: Plaintiff (REDACTED) [BS DEF PPB 08398-0411]
18	Plaintiff's ODOC Field File - Section 1: Consolidated Records Card (REDACTED) [BS DEF ODOC 308-317]
19	Plaintiff's ODOC Field File - Section 2: Judgment and Sentence Records (REDACTED) [BS DEF ODOC 318-353]
20	Plaintiff's ODOC Field File - Section 3: Inmate Time Credit Reports (REDACTED) [BS DEF ODOC 354-462]
21	Plaintiff's ODOC Field File - Section 4: College Transcripts and Achievement Credits (REDACTED) [BS DEF ODOC 463-490]
22	Plaintiff's ODOC Field File - Section 5: Custody Assessment Scales and Misconduct Screening Forms (REDACTED) [BS DEF ODOC 491-581]
23	Plaintiff's ODOC Field File- Section 6: Institution Records (REDACTED) [BS DEF ODOC 582-750]
24	Plaintiff's ODOC Field File- Section 7: Housing Records (REDACTED) [BS DEF ODOC 751-759]
25	Plaintiff's ODOC Field File- Section 8: Disciplinary Reports and Misconduct Records (REDACTED) [BS DEF ODOC 760-823]
26	Plaintiff's ODOC Field File- Section 9: Facility Records and Self Report Forms (REDACTED) [BS DEF ODOC 824-857]
27	Plaintiff's ODOC Field File- Section 10: Custody Assessment Scales and Misconduct Screening Forms (REDACTED) [BS DEF ODOC 858-959]
28	Plaintiff's ODOC Field File- Section 11: Offender Lookup (REDACTED) [BS DEF ODOC 960-990]
29	Plaintiff's ODOC Field File- Section 12: Adjustment Review and Offender Records (REDACTED) [BS DEF ODOC 991-1136]
30	Plaintiff Dwain Thomas Notification of Parole Hearing Date [BS DEF ODOC 23385]
31	Affidavit of Mark Knutson [ Dkt. 36-15, pg. 2]
	<b>EXHIBITS WHICH MAY BE USED:</b>
32	Investigation Report [ Dkt. 36, pgs. 3-9]
33	Pardon and Parole Board Appeal of Parole Docket Date Form [BS DEF PPB 00053]
34	Notification of Parole Hearing Date Form [BS DEF PPB 00054]
35	Waiver of Parole Form [BS DEF PPB 00055]

36	Inmate Request to Parole Investigator Form [BS DEF PPB 00056]
37	Parole Consideration Form [BS DEF PPB 00057]
38	Parole Interview Questionnaire [BS DEF PPB 00058-64]
39	Pardon and Parole Board Form 007-A – Request for Jacket Review [BS DEF PPB 00065]
40	Pardon and Parole Board Employee Handbook – 2022 [BS DEF PPB 00066-00137]
41	Parole Process Procedures Training PowerPoint [BS DEF PPB 01137-01195]
42	October 2019 Parole and Business Meeting Minutes [BS DEF PPB 23386-23392]
43	Department of Corrections Policies and Procedures Section 06 – Classification and Case Management
44	Department of Corrections Policies and Procedures Section 09 – Programs
45	Pardon and Parole Board Policy 101 – Duties and Responsibilities of the Pardon and Parole Board
46	Pardon and Parole Board Policy 102 – Duties, Responsibilities, and Code of Conduct
	Any and all exhibits for impeachment and/or rebuttal.
	All documents produced by Plaintiff in discovery not objected to by Defendants.
	All exhibits listed or identified by Plaintiff and not objected to by Defendants.
	Defendants reserve the right to list additional exhibits identified in or necessitated by subsequent discovery or depositions.

Respectfully submitted,

s/ Alejandra J. Brigida

**ALEJANDRA J. BRIGIDA, OBA# 35381**

**LAUREN J. RAY, OBA# 22694**

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*Counsel for Defendants DOC, BOC and PPB*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of July, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all counsel of record in this action.

/s/ Alejandra J. Brigida

Alejandra J. Brigida